IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

SCOTT D. MINNICH, : CHAPTER 13

Debtor :

CASE NO. 1:15-bk-04365 HWV

NATIONSTAR MORTGAGE LLC,

Movant

:

SCOTT D. MINNICH,

v.

Debtor : 11 U.S. C. SECTION 362

<u>ANSWER TO MOTION OF NATIONSTAR MORTGAGE, LLC</u> FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES Debtor, Scott D. Minnich, by and through his undersigned counsel, answering Nationstar Mortgage, LLC's Motion for Relief from the Automatic Stay as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted in part, Denied in remainder. It is admitted that Movant holds a mortgage as referenced. It is denied that the account history is accurate as Debtor is still reviewing it for completeness.
 - 4. (Erroneously shown as 1.) Admitted.
- 5. (Erroneously shown as 2.) Denied. Debtor has paid or intends to pay any outstanding mortgage payments.
- 6. (Erroneously shown as 3.) Denied. Debtor has paid or intends to pay any outstanding mortgage payments.

- 7. (Erroneously shown as 4.) Denied. Debtor is current or intends to bring current his Chapter 13 Plan payments.
- 8. (Erroneously shown as 5.) Denied. Debtor has brought the account current or intends to do so.
- 9. (Erroneously shown as 6.) Denied. Debtor has brought the account current or intends to do so.

WHEREFORE, Debtor respectfully requests that the Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

LAW OFFICES OF CRAIG A. DIEHL

Date: April 3, 2018 By: /s/ Craig A. Diehl, Esquire, CPA

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